

Exhibit F

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Attorneys for Defendants Watchtower
and Othello (North) Spanish Congregation

The Honorable Edward F. Shea

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
JUN 05 2003
JAMES R. LARSEN, CLERK
DEPUTY,
SPOKANE, WASHINGTON

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WASHINGTON**

ERICA RODRIGUEZ, a single
person,

Plaintiff,

vs.

WATCHTOWER BIBLE and
TRACT SOCIETY OF NEW YORK,
INC., a New York corporation;
OTHELLO SPANISH
CONGREGATION OF
JEHOVAH'S WITNESSES, an
unknown legal entity; and MANUEL
BELIZ, individually and on behalf of
his marital community,

Defendants.

No. CS-02-0190-EFS

**DEFENDANTS
WATCHTOWER AND
OTHELLO (NORTH)
SPANISH
CONGREGATION'S
DISCLOSURES RE:
EXPERT WITNESSES**

DEFENDANTS WATCHTOWER AND
OTHELLO'S DISCLOSURES RE: EXPERT
WITNESSES - 1

PAINE, HAMBLIN, COFFIN, BROOKE & MILLER LLP
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1 COMES NOW the defendants Watchtower Bible and Tract Society of
2 New York, Inc. and the Othello (North) Spanish Congregation of Jehovah's
3 Witnesses, by and through their attorneys, who hereby disclose the identity of
4 expert witnesses that may be called at the time of trial of this matter:
5
6

7 (1) Park Dietz & Associates, Inc.
8 Forensic Consultants in Medicine and the Behavioral Sciences
9 537 Newport Center Drive, Suite 300
10 Newport Beach, CA 92660
11 Telephone (949) 760-0422

12 Dr. Park Dietz (M.D., M.P.H., Ph.D.) is a forensic psychiatrist, whose
13 curriculum vitae is attached. Dr. Daniel A. Martell (Ph.D.) is nationally
14 recognized forensic neuropsychologist, whose curriculum vitae is also
15 attached.
16
17

18 Depending upon specifics of disclosures yet to be received with respect
19 to plaintiff's experts, it is anticipated that the above individuals will review
20 specifics of any opinions and conclusions of plaintiff's experts, together with
21 treatment records, test data, depositions, testimony and other documents and
22 information and formulate opinions based upon their background, training and
23 experience. Further, depending upon the specifics of such substantive
24 disclosures by plaintiff's experts, it is anticipated that Dr Martell may
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28 DEFENDANTS WATCHTOWER AND
29 OTHELLO'S DISCLOSURES RE: EXPERT
30 WITNESSES - 2

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1 undertake testing and examination of plaintiff. They will also develop
2 opinions in assessment of plaintiff's claimed injuries and damages. It is
3 further anticipated that Dr. Dietz, a nationally recognized expert on the subject
4 of the detection and recognition of sex offenders, the affects of child sexual
5 abuse, and related subject matter, will offer expert opinion testimony specific
6 to the inherent difficulty associated with identifying pedophiles from among
7 volunteers in a church organization. It is further anticipated Dr. Dietz will
8 offer opinion testimony that defendants Watchtower and the Othello (North)
9 Spanish Congregation of Jehovah's Witnesses in this instance could not have
10 reasonably identified or prevented Manuel Beliz from molesting plaintiff.
11

12
13 Depending upon disclosures of plaintiff's experts, the above individuals
14 may offer additional expert opinion testimony on subject matter addressed on
15 opinions and conclusions of plaintiff's experts to the extent that such opinions
16 and conclusions differ from their own. Their reports will be made available
17 following reasonable opportunity for review of disclosures from plaintiffs
18 expert(s) and following the depositions of plaintiff's expert(s) at which time
19 they will be made available for deposition.
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29 DEFENDANTS WATCHTOWER AND
30 OTHELLO'S DISCLOSURES RE: EXPERT
WITNESSES - 3

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1 (2) In reviewing the information provided by plaintiff with respect to
2 William Bowen, these defendants are of the opinion that the proffered
3 opinions of Mr. Bowen are not the appropriate subject matter for expert
4 opinion testimony in this case and anticipate a motion directed to the exclusion
5 of such testimony. However, in the event that the Court permits testimony of
6 Mr. Bowen regarding church practices and procedures, these defendants may
7 offer expert opinion testimony from Gary Breaux, previously identified in
8 these defendants' Rule 26(a)(1) disclosures on such subject matter.
9

10 These defendants reserve the right to have the above-referenced experts
11 consider new issues or reconsider issues already considered as this case
12 progresses, to include any new assertions by plaintiff or third parties. Further,
13 these experts' particular opinions may change dependent upon newly
14 identified facts and information. These defendants will supplement these
15 disclosures as additional information regarding the opinions, facts and bases
16 for such opinions as such information becomes available, and there has been
17 reasonable opportunity for review of the data, testing, facts and bases for
18 opinions of plaintiff's experts, once such are disclosed.
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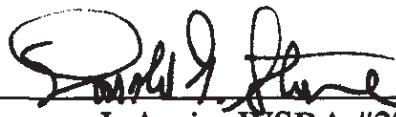
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28 DEFENDANTS WATCHTOWER AND
29 OTHELLO'S DISCLOSURES RE: EXPERT
30 WITNESSES - 4

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1 DATED this 5th day of June, 2003.

2 PAINE, HAMBLLEN, COFFIN,
3 BROOKE & MILLER LLP
4

5
6 By: 
7 Gregory J. Arpin, WSBA #2746
8 Donald G. Stone, WSBA #7547
9 Attorneys for Defendants
10 Watchtower and Othello (North)
11 Spanish Congregation
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29 DEFENDANTS WATCHTOWER AND
30 OTHELLO'S DISCLOSURES RE: EXPERT
WITNESSES - 5

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CERTIFICATE OF SERVICE

I certify that on this 5th day of June, 2003, a true and correct copy of the foregoing DEFENDANTS WATCHTOWER AND OTHELLO (NORTH) SPANISH CONGREGATION'S DISCLOSURES RE: EXPERT WITNESSES, was caused to be served as indicated below and addressed as follows:

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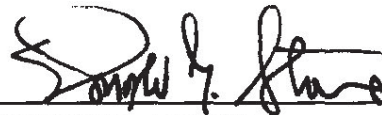
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DEFENDANTS WATCHTOWER AND
OTHELLO'S DISCLOSURES RE: EXPERT
WITNESSES - 6

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GREGORY J. ARPIN
DONALD G. STONE

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DEFENDANTS WATCHTOWER AND
OTHELLO'S DISCLOSURES RE: EXPERT
WITNESSES - 7

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